

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

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|------------------------------------|---|---------------------------------------|
| WSOU INVESTMENTS, LLC D/B/A | § | |
| BRAZOS LICENSING AND | § | CIVIL ACTION 6:20-cv-00980-ADA |
| DEVELOPMENT, | § | CIVIL ACTION 6:20-cv-00981-ADA |
| <i>Plaintiff,</i> | § | CIVIL ACTION 6:20-cv-00982-ADA |
| | § | CIVIL ACTION 6:20-cv-00984-ADA |
| v. | § | CIVIL ACTION 6:20-cv-00985-ADA |
| | § | |
| CANON, INC., | § | |
| <i>Defendant.</i> | § | |
| | § | |

JOINT CASE READINESS STATUS REPORT

TO THE HONORABLE COURT:

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) and Defendant Canon, Inc. (“Canon”) hereby provide the following status report in advance of the initial Case Management Conference (CMC).

FILINGS AND EXTENSIONS

Plaintiff WSOU filed a complaint in each of the above-numbered cases on October 19, 2020. There have been no extensions.

RESPONSES TO THE COMPLAINTS

On March 15, 2021, Defendant Canon responded to each of WSOU's Complaints by filing an Answer and Affirmative Defenses. *See* Case No. 6:20-cv-00980, Dkt. 17; Case No. 6:20-cv-00981, Dkt. 14; Case No. 6:20-cv-00982, Dkt. 14; Case No. 6:20-cv-00984, Dkt. 14; Case No. 6:20-cv-00985, Dkt. 14.

PENDING MOTIONS

On March 15, 2021, Defendant Canon filed a Motion to Dismiss Complaint for Patent Infringement in each of the above-numbered cases. *See* Case No. 6:20-cv-00980, Dkt. 16; Case No. 6:20-cv-00981, Dkt. 13; Case No. 6:20-cv-00982, Dkt. 13; Case No. 6:20-cv-00984, Dkt. 13; Case No. 6:20-cv-00985, Dkt. 13.

On March 18, 2021, Plaintiff WSOU filed an Unopposed Motion for Extension of Time to File Responses to Defendant Canon, Inc.'s Motions to Dismiss in each of the above-numbered cases. *See* Case No. 6:20-cv-00980, Dkt. 19; Case No. 6:20-cv-00981, Dkt. 18; Case No. 6:20-cv-00982, Dkt. 18; Case No. 6:20-cv-00984, Dkt. 18; Case No. 6:20-cv-00985, Dkt. 18.

There are no other pending motions.

RELATED CASES IN THIS JUDICIAL DISTRICT

The above-numbered cases were all filed by Plaintiff WSOU against Defendant Canon in this District. There are no known related cases.

IPR, CBM, AND OTHER PGR FILINGS

There are no known IPR, CBM, or other PGR filings with respect to the patents asserted in the above-numbered cases.

NUMBER OF ASSERTED PATENTS AND CLAIMS

Plaintiff WSOU has asserted one patent in each case. Plaintiff WSOU has not yet identified the number of asserted claims, although it asserted one claim in each Complaint. Plaintiff WSOU has not yet served its preliminary infringement contentions.

APPOINTMENT OF TECHNICAL ADVISER

The parties are discussing whether appointment of a technical adviser would be beneficial and will so advise the Court in the coming weeks.

MEET AND CONFER STATUS

Plaintiff WSOU and Defendant Canon conducted a meet & confer conference for the above-numbered cases on March 19, 2021. The parties raise the following pre-*Markman* issues:

Protective Order. The parties anticipate submitting a proposed form of protective/confidentiality order, or their limited disputes regarding such an order, in the coming weeks.

The parties currently have no other pre-*Markman* issues for discussion at the CMC.

Date: March 22, 2021

Respectfully submitted,

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